

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

KEITH COLE, JACKIE BRANNUM,	§	
RICHARD KING, MICHAEL DENTON,	§	
FRED WALLACE, and MARVIN RAY YATES,	§	
individually and on behalf of those similarly situated,	§	CIVIL ACTION NO.
Plaintiffs,	§	4:14-cv-1698
	§	
v.	§	
	§	
BRYAN COLLIER, in his official capacity,	§	
ROBERTO HERRERA, in his official capacity,	§	
and TEXAS DEPARTMENT OF CRIMINAL	§	
JUSTICE,	§	
Defendants.	§	

PLAINTIFFS' DEPOSITION DESIGNATIONS

Plaintiffs hereby submit the deposition designations enumerated below and attached as Exhibits 1–21 for use at the preliminary injunction hearing in this matter. Plaintiffs further offer the declarations of Marvin Yates and Fred Wallace, attached as Exhibits 22 and 23. Finally, to the extent necessary, Plaintiffs offer the entire hearing transcript for May 26, May 27, June 1, and June 2, 2016 and all exhibits before the Court during that hearing. *See* FED. R. CIV. PROC. 65(a)(2); Doc. 459; Doc. 460; Doc. 465; Doc. 466; Docs. 474–475; Doc. 511.

The designated excerpts of each deposition are attached as Exhibits 1–21, corresponding to the list below:

1. Deposition of Dr. Charles Adams, M.D., May 18, 2016:

Beg. page:line	End page:line	Agreed	Admitted
241:11	241:17		
241:20	241:21		
242:10	242:13		
242:16	243:18		
243:21	243:25		

2. Deposition of Dr. Glenda Adams, M.D., March 7, 2013:

Beg. page:line	End page:line	Agreed	Admitted
271:12	271:14		
271:16	271:23		
272:1	273:12		
284:9	285:22		

3. Deposition of Dr. Glenda Adams, M.D., November 19, 2013:

Beg. page:line	End page:line	Agreed	Admitted
68:6	68:10		
68:23	68:25		
116:1	116:12		
125:12	125:18		
128:8	129:2		
129:15	129:24		
164:5	164:7		
164:13	164:18		
164:22	164:23		
166:10	166:21		
166:25	167:5		
167:11	167:19		
193:11	193:18		
236:12	237:12		

4. Deposition of Dr. Glenda Adams, M.D., January 31, 2017:

Beg. page:line	End page:line	Agreed	Admitted
31:22	32:15		
75:10	75:24		
145:5	145:11		
163:10	163:17		
163:22	163:24		
164:3	164:5		
192:16	192:20		
226:1	226:12		
232:14	232:17		
232:21	233:9		
233:17	233:18		
233:22	233:23		
237:1	237:7		
237:11	237:12		
238:5	238:14		

4. Deposition of Dr. Glenda Adams, M.D., January 31, 2017 (continued from previous):

Beg. page:line	End page:line	Agreed	Admitted
238:18	238:18		
241:19	241:24		
242:7	242:12		
283:8	284:2		

5. Deposition of Debra Allison, August 6, 2015:

Beg. page:line	End page:line	Agreed	Admitted
9:21	10:9		
62:19	63:11		
68:6	68:11		
69:3	69:5		
69:12	69:23		
73:20	73:23		
74:2	75:24		
87:16	88:6		
89:16	90:6		
92:10	92:12		
94:25	95:8		
95:11	95:19		
113:7	113:9		
113:14	113:17		
115:11	115:19		
142:7	142:25		
156:5	156:16		
182:8	182:23		
190:25	191:4		
199:2	205:23		
221:18	222:24		
223:4	223:8		
226:7	226:21		
227:12	227:22		

6. Deposition of Dr. Fausto Avila, M.D., March 5, 2015:

Beg. page:line	End page:line	Agreed	Admitted
13:22	14:5		
21:23	21:25		
39:24	40:13		
114:21	114:23		
120:9	120:21		
122:7	122:23		
123:1	123:8		
123:21	124:23		
126:15	126:16		
126:19	126:23		
127:23	128:5		
128:7	128:7		
128:11	128:18		
129:2	129:15		
129:18	129:22		
132:18	133:4		
133:6	133:7		
195:8	195:11		
199:5	199:9		
199:13	199:13		
204:8	204:17		
207:23	208:25		

7. Deposition of Dr. Fausto Avila, M.D., March 11, 2016:

Beg. page:line	End page:line	Agreed	Admitted
17:8	17:22		
17:23	18:1		
18:11	19:16		
20:10	20:23		
24:18	25:3		
25:12	25:22		
39:5	40:18		
41:3	42:3		
42:18	42:22		
76:9	76:25		
97:4	97:5		
97:7	97:7		

8. Deposition of Bryan Collier, June 26, 2017:

Beg. page:line	End page:line	Agreed	Admitted
124:10	124:14		
194:11	194:16		
194:21	195:10		
196:21	197:18		
197:25	198:17		
200:16	200:18		
202:11	202:18		
203:10	203:22		
206:25	207:9		
208:2	208:8		

9. Deposition of George Crippen, R.N., March 24, 2016:

Beg. page:line	End page:line	Agreed	Admitted
24:16	24:20		
25:5	25:11		
30:2	30:6		
30:15	30:17		
31:10	31:17		
32:2	32:14		
33:13	33:23		
35:9	35:16		
43:21	44:8		
62:5	62:9		
73:14	73:20		
74:8	75:13		
114:9	114:24		
126:22	127:10		
169:4	170:13		
170:17	171:5		
171:7	171:7		
171:12	171:16		
172:2	173:1		
173:4	173:6		
177:19	178:3		
183:22	185:25		
213:21	213:24		
215:3	215:23		
221:2	221:8		
221:12	221:12		
224:4	224:24		
225:6	225:9		
225:12	227:4		
242:1	242:17		
263:2	263:23		
264:1	264:1		
265:10	265:15		
265:19	265:20		
265:25	266:3		
272:12	272:21		
275:18	276:25		
287:2	287:6		
288:16	288:21		

10. Deposition of Robert Eason, March 26, 2013:

Beg. page:line	End page:line	Agreed	Admitted
13:16	13:20		
107:5	107:11		
107:13	107:16		
121:3	121:5		
219:12	219:17		

11. Deposition of Cody Ginsel, June 15, 2017:

Beg. page:line	End page:line	Agreed	Admitted
12:6	12:15		
16:8	16:24		
18:13	18:16		
18:18	18:21		
19:8	19:11		
19:13	19:13		
25:2	25:21		
31:7	32:6		
38:20	38:24		
53:22	53:24		
57:8	57:15		
61:4	61:7		
62:6	62:19		
64:16	64:23		
66:15	66:22		
156:5	156:6		
156:11	156:20		
156:22	156:22		

12. Deposition of Frank Inmon, May 5, 2017:

Beg. page:line	End page:line	Agreed	Admitted
11:21	12:2		
21:4	21:17		
26:11	26:16		
26:22	27:9		
34:1	34:12		
34:17	35:14		
37:10	37:22		
38:8	38:11		
39:2	39:9		
45:12	46:1		
70:17	71:11		
83:8	83:14		
83:17	83:25		
84:16	86:2		
86:6	87:14		
95:23	96:9		
126:2	126:6		
126:20	127:2		
127:7	128:6		
128:22	129:4		
130:16	130:20		
130:23	131:5		
131:8	131:13		
131:15	131:20		
133:18	134:5		
134:8	134:9		
134:11	134:11		
134:19	134:20		
134:23	134:23		
136:20	137:7		
137:14	137:22		
137:25	138:3		
138:20	138:23		
139:1	139:13		
139:15	139:16		
140:23	141:5		
141:7	141:8		
144:22	144:25		
145:9	145:17		
145:20	146:17		
150:7	150:11		
150:13	151:5		
151:10	151:20		
152:1	152:10		

12. Deposition of Frank Inmon, May 5, 2017 (continued from previous page):

152:12	152:18
153:20	154:1
155:7	155:8
155:11	155:12
155:14	155:16
156:1	156:2
156:5	156:7
156:9	156:15
156:18	156:18
157:4	157:8
157:11	157:16
157:19	158:1
158:4	158:4
164:11	164:14
164:17	164:17
164:19	164:20
167:9	167:10
167:15	168:3
168:6	168:6
168:17	168:19
168:22	168:25
169:2	169:4
170:11	170:11
170:14	170:18
176:4	176:16

13. Deposition of Dr. Lanette Linthicum, M.D., January 13, 2016:

Beg. page:line	End page:line	Agreed	Admitted
72:6	72:11		
124:14	124:17		
124:20	125:23		
127:1	128:25		
207:2	208:10		

14. Deposition of Dr. Lanette Linthicum, M.D., January 14, 2016:

Beg. page:line	End page:line	Agreed	Admitted
240:6	240:18		
255:6	256:10		
259:12	259:25		
314:21	315:4		
317:3	318:3		

15. Deposition of Brad Livingston, October 1, 2015:

Beg. page:line	End page:line	Agreed	Admitted
62:12	62:15		
62:25	62:25		
74:20	74:25		
76:1	76:8		
76:12	77:10		
77:17	77:23		
86:5	86:14		
86:25	87:6		
91:22	92:8		
180:7	180:25		

16. Deposition of Brad Livingston, October 2, 2015:

Beg. page:line	End page:line	Agreed	Admitted
21:17	21:22		
35:15	35:19		
55:7	55:10		
69:5	69:8		
99:8	99:10		
99:15	99:19		

17. Deposition of Major Matthew McClarin, July 14, 2015:

Beg. page:line	End page:line	Agreed	Admitted
20:7	20:9		
86:8	86:10		
109:4	109:6		
122:4	122:6		
128:2	128:20		
130:10	130:12		
165:16	166:13		
183:22	184:5		

18. Deposition of Fred Wallace, September 17, 2015:

Beg. page:line	End page:line	Agreed	Admitted
30:13	30:22		
31:6	32:25		
34:3	41:24		

19. Deposition of Marvin Yates, September 3, 2015:

Beg. page:line	End page:line	Agreed	Admitted
67:8	67:18		
68:14	68:19		
69:3	69:9		
87:9	87:10		
87:14	87:18		
88:8	89:19		
96:21	97:11		

If, and only if, the Court admits or otherwise considers any out-of-court statement of Dr.

Vassallo, Plaintiffs respectfully offer the following redirect designations:

20. Deposition of Dr. Susi Vassallo, M.D., February 26, 2016:

Beg. page:line	End page:line	Agreed	Admitted
244:12	245:22		

21. Deposition of Dr. Susi Vassallo, M.D., May 10, 2017:

Beg. page:line	End page:line	Agreed	Admitted
179:22	180:20		
180:21	181:7		

Dated: July 3, 2017

Respectfully submitted,
EDWARDS LAW
The Haehnel Building
1101 East 11th Street
Austin, TX 78702
Tel. (512) 623-7727
Fax. (512) 623-7729

By /s/ Jeff Edwards
JEFF EDWARDS
State Bar No. 24014406
Attorney-in-Charge
Scott Medlock
State Bar No. 24044783
Michael Singley
State Bar No. 00794642
David James
State Bar No. 24092572
Federal ID No. 2496580

Jeremy Doyle
State Bar No. 24012553
Federal ID No. 24559
Nathan Smith
State Bar No. 24053060
Federal ID No. 1075505

REYNOLDS FRIZZELL LLP
1100 Louisiana
Suite 3500
Houston, TX 77002
Tel. (713) 485-7200
Fax. (713) 485-7250

Wallis Nader
Texas Bar No. 24092884
Southern District No. 2609150

TEXAS CIVIL RIGHTS PROJECT—
HOUSTON
2006 Wheeler Avenue
Houston, TX 77004
Tel. (832) 767-3650
Fax. (832) 554-9981

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

By my signature below, I certify that a true and correct copy of the foregoing has been served on all counsel of record through the Electronic Case Files System of the Southern District of Texas.

By /s/ Jeff Edwards
Jeff Edwards